

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 12/26/02 – 1315

Site Contact(s): C. J. Freiboth (KH) – (CJF-040)
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Regulatory Contact: James Hindman, CDPHE
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Agency: CDPHE

Purpose of Contact: State (CDPHE) concurrence on Dismantlement and Removal of Furnaces in Room 125 – T0110528

Meeting Attendance

C. J. Freiboth, KH PM James Hindman, CDPHE

Discussion

On September 12, 2002 at 1025, a copy of T0110528 – Building 444: Remove Furnaces and Ancillary Equipment from Room 125 was provided to the State (Hindman).

On October 4, 2002 at 0935, the State (Hindman) requested photo's of the three furnaces in Room 125 and asked what quenching media and oils were used in the process.

On October 7, 2002 at 1634, the State (Hindman) was provided with photos and descriptions of the oil and wash media used with the furnaces.

On October 10, 2002 at 1236, the State (Hindman) concurred with the mechanical disconnects of the Lindberg Tempering furnace and Lindberg Wash Furnace in Building 444 room 125. This does not include any asbestos abatement or cutting a hole in the wall of the facility. In addition, the State (Hindman) requested a walkdown or additional photographs of the large Lindberg Quench Furnace.

On October 17, 2002 at 1450, additional photographs of the Lindberg Quench Furnace were provided to the State (Hindman).

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CEX-105-01

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ADMIN RECORD
B444-A-000017

On December 5, 2002, at 1310, the State (Hindman) asked the following questions. Responses to these questions were provided to the State (Hindman) on December 18, 2002 at 0542.

- (1) **QUESTION** – RLCR identified that there were 3 Be samples taken in the Room 125 furnace pit. One of the samples was at 0.124 ug/cm². What are the in-process characterization plans for the furnace removal from a Be perspective.

RESPONSE – Additional characterization will depend on how much disassembly is required/needed. While we have sampled the exterior of these furnaces (2 small and 1 large) and the pit, we will get samples from the inside as well. Additionally, all accessible areas and newly exposed areas from disassembly will be encapsulated (CC Fix) as the areas are exposed (A.K.A. spray as we go). The pit is not very accessible at the moment, but once we have to get into it, we should use wet methods to remove/decrease the contamination as needed and/or fix it. The pit has an oily residue (slip hazard) so the potential for beryllium exposure is minimal at the moment.

It is important to note that beryllium contamination levels in the room and on the furnaces have been below 0.2 µg/100 cm². We're dealing with much lower levels than we have on other pieces of equipment. We will continue to perform personal air monitoring throughout the project. We have had no positive air samples from any work in this room to date.

As for minimizing potential beryllium exposures, we are using the same techniques that we have been successful at while removing other beryllium contaminated machinery out of the building. This will include:

1. Using wet wipes and/or HEPA vacuums to remove loose contamination as needed;
2. Spraying the exterior areas down with CC Wet prior to doing to disassembly;
3. Using a combination of wet methods and/or LEV while performing dust-generating activities (cutting, grinding, etc.).
4. The room is operating under negative ventilation, thereby allowing the air in the room to change frequently and to prevent spreads of contamination from the room/past the step-off pad

- (2) **QUESTION** – How is the waste going to be packaged?

RESPONSE – Waste will be sent to a sanitary landfill like all of the other equipment removed from the Cold Side. Whether or not the furnace has some non-friable ACM will affect which landfill will be used. If it is found to be Be contaminated it will be sprayed with a permanent fixative and/or shrink wrapped in order to prevent beryllium contamination spread.

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(3) **QUESTION** – How are any releases going to be prevented?

RESPONSE – Potential beryllium release will be managed by using the engineering controls listed in the response to Item (1). Additional information from wipe samples inside the furnace will allow us to more fully evaluate contamination levels and exposure potential

On December 26, 2002, at 1315, during a meeting with the State (Hindman) the responses provided to the State (Hindman) questions were discussed. Upon completion of the discussion, concurrence to perform work in accordance with Work Package T0110528 was provided by the State (Hindman).

Contact Record Prepared By: C. J. Freiboth

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